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13 Attorneys for Defendants
UBER TECHNOLOGIES, INC.
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MARTHA L.
GOODMAN IN SUPPORT OF
DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO, LLC'S MOTION FOR
RELIEF FROM NONDISPOSITIVE
PRETRIAL ORDER OF MAGISTRATE
JUDGE (DKT. 1172).**

Judge: Hon. William H. Alsup
Trial Date: October 10, 2017

1 I, Martha L. Goodman, declare as follows:

2 1. I am an attorney at law at the law firm of Boies Schiller Flexner LLP representing
3 Defendants Uber Technologies Inc. and Ottomotto LLC (collectively, "Uber") in this matter. I
4 make this declaration in support of Uber's Motion for Relief from Magistrate Judge Corley's
5 August 14, 2017 Order re: Uber's Waiver of Privileged Communications (Dkt. 1172). I make
6 this declaration based on personal knowledge and if called as a witness, I could and would
7 competently testify to the matters set forth herein.

8 2. Attached as **Exhibit 1** is a true and correct copy of a document produced by Uber
9 in this action bearing Bates number UBER00069659.

10 I declare under penalty of perjury that the foregoing is true and correct.

11 Executed this 16th day of August, 2017 at San Francisco, California.

12
13 By: /s/ Martha L. Goodman
14 Martha L. Goodman

15
16
17 **ATTESTATION OF E-FILED SIGNATURE**

18 I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this
19 Declaration. In compliance with General Order 45, X.B., I hereby attest that Martha L. Goodman
20 has concurred in this filing.

21
22 /s/ Karen L. Dunn
23 Karen L. Dunn